

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CARLOS P. SANTIAGO TORRES
WALESKA RIVERA CRUZ
Debtor(s)

CASE NUMBER: 11-06802 BKT

CHAPTER 13 (ASSET CASE)

MOTION REQUESTING THE CONTINUANCE OF THE AUTOMATIC STAY

TO THE HONORABLE COURT:

COMES now Debtor(s) represented by the undersigned counsel and respectfully Allege(s) and Pray(s) as follows:

1. The Debtors move the court to enter an order for continuance of the automatic stay provided under s 362 (a). In support of this motion, the Debtor states as follows:

2. Debtors have one prior bankruptcy within one year from the filing of the instant case and respectfully request the stay be continued in regards with his creditors based on the following circumstances:

a) They couldn't make the payments due to the fact that debtor's spouse had medical problems. Debtors believe their income is back to normal. He returned to his job and she obtained the Social Security income and now they will be able to comply with the payment schedule plan.

b) Debtors are fully aware that the bankruptcy is a privilege and he needs a chance to provide he can reorganize their finance by completing with their payment schedule plan, this in order to retain their vehicle which is their only means of transportation.

WHEREFORE, the Debtors respectfully requested from this Honorable Court to continue the automatic stay under Section 362(a) as to all Creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under s 362(c)(1) or (c)(2) or a motion for relief is granted under s 362(d).

NOTICE: "Parties in interest are hereby granted fourteen (14) days from the date of this notice to request hearing. If no opposition is filed within the prescribed period of time the Court will enter an order granting the motion upon the filing of a certificate by the movant that adequate notice was given. Should an opposition be timely filed the Court will schedule the motion for a hearing as a contested matter. Absent good cause, untimely rejections should be denied."

In San Juan, Puerto Rico, this 16th, day of August 2011.

RESPECTFULLY SUBMITTED.

/s/Marilyn Valdes Ortega
MARILYN VALDES ORTEGA
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I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

11-06382-13 Notice will be electronically mailed to:

JOSE RAMON CARRION MORALES
newecfmail@ch13-pr.com

MONSITA LECAROS ARRIBAS
ustpreion21.hr.ecf@usdoj.gov

MARILYN VALDES ORTEGA on behalf of Debtor
valdeslaw@prtc.net

I HEREBY CERTIFY: That I have mailed by regular mail to all creditors listed.

11-06382-13 Notice will not be electronically mailed to:

AEELA
PO BOX 364508
SAN JUAN, PR 00936-4508

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